**DATE:** May 22, 2017, 2:30pm - 3:00pm

**FROM:** Vincent DeVito, Counselor for Energy Policy

**SUBJECT:** Meeting with American Petroleum Institute President and CEO, Jack Gerard

### I. STATEMENT OF PURPOSE

American Petroleum Institute (API) has asked you to permanently kill the Obama Administration's flaring regulations following the Senate's failed attempt to kill the rule via the Congressional Review Act.

### II. BACKGROUND

The American Petroleum Institute (API) is asking the Secretary to act in the wake of the Senate's failure. Certain companies have said they would need to shut-in operations without reversal of the Obama rules.

The Department is moving aggressively to assist production and workers and plans to grant companies an extra two years to comply with the federal regulations limiting flaring and gas leaks on public lands.

This also aligns with the President's Energy Independence Executive Order requiring the Department to consider revising or withdrawing regulations.

By delaying the rule, the Department will provide relief to the oil and gas industry from a regulation we plan to permanently change. This provides certainty for operators of federal oil and gas leases subject to its terms. This summer, we plan to issue a new rule making rescinding the Obama rules while maintaining the royalty-free uses provision.

We will also exercise our broad enforcement discretion on a case by case basis. No enforcement of the Obama rules has occurred yet.

### III. ADDITIONAL NOTE

Over the weekend (before Monday's meeting) DeVito will lead a call with the industry groups suing to block the regulations and discuss their staying the actions against the Department in view of our aggressive response.

# Label: "FOIA/OS-2017-01201"

# Created by:downey\_magallanes@ios.doi.gov

Total Messages in label:1 (1 conversations)

Created: 03-26-2018 at 08:28 AM

### **Conversation Contents**

Invitation: American Petroleum Institute Meeting @ Mon May 22, 2017 2:30pm - 3pm (downey\_magallanes@ios.doi.gov)

### **Attachments:**

/1. Invitation: American Petroleum Institute Meeting @ Mon May 22, 2017 2:30pm - 3pm (downey\_magallanes@ios.doi.gov)/1.1 invite.ics

/1. Invitation: American Petroleum Institute Meeting @ Mon May 22, 2017 2:30pm - 3pm (downey magallanes@ios.doi.gov)/1.2 invite.ics

## ios.doi.gov

From: os.doi.gov

**Sent:** Fri May 19 2017 11:18:31 GMT-0600 (MDT)

**To:**downey\_magallanes@ios.doi.gov, vincent\_devito@ios.doi.gov
aaron thiele@ios.doi.gov, christine bauserman@ios.doi.gov,

gisella ojeda-dodds@ios.doi.gov

Subject: Invitation: American Petroleum Institute Meeting @ Mon May 22,

2017 2:30pm - 3pm (downey magallanes@ios.doi.gov)

Attachments: invite.ics invite.ics

### American Petroleum Institute Meeting

more details »

Attendees:

Jack Gerard, President & CEO

Topic:

BLM Venting & Flaring rule Regulatory review

When Mon May 22, 2017 2:30pm – 3pm Eastern Time

Where Office of the Secretary (map)

Video call <a href="https://plus.google.com/hangouts/">https://plus.google.com/hangouts/</a> /doi.gov/doi-gov-6e9vkmg

Calendar downey magallanes@ios.doi.gov

Who

• ios.doi.gov - organizer

· caroline boulton@ios.doi.gov - creator

· vincent devito@ios.doi.gov

· downey\_magallanes@ios.doi.gov

• aaron thiele@ios.doi.gov - optional

• christine\_bauserman@ios.doi.gov - optional

• gisella\_ojeda-dodds@ios.doi.gov - optional

Going? Yes - Maybe - No more options »

Invitation from Google Calendar

You are receiving this email at the account downey\_magallanes@ios.doi.gov because you are subscr bed for invitations on calendar downey\_magallanes@ios.doi.gov.

To stop receiving these emails, please log in to https://www.google.com/calendar/ and change your notification settings for this calendar.

Forwarding this invitation could allow any recipient to modify your RSVP response. Learn More.































From: To: Cc: Subject: Start: End: Location: to 16)

whicen deviloeins dol gov: downey maga lanes@los dol gov
golla ojeda-dodds@los dol.gov: christine bauserman@los dol gov: aaron thiele@los dol.gov
American Petroleum Institute Meeting
Monday, May 22, 2017 2:30:00 PM
Office of the Secretary

Attendees: Jack Gerard, President & CEO

Topic: BLM Venting & Flaring rule Regulatory review

This event has a Google Hangouts video call.

Join: https://plus.google.com/hangouts//doi.gov/doi-gov-6e9vkmq?hceid ZG9pLmdvdl82ZT12a21xYjliNGFyOWlvbTFocm4wZmsyb0Bncm91cC5jYWxlbmRhci5nb29nbGUuY29t.9260ajul63oq6fnjbb4cetovdo&hs 121

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action VIEW&eid OTI2MGFqdWw2M29xNmZuamJiNGNidG9ZZG8gZ2lzZWxxYV9vamVkYS1kb2Rkx0Bpb3MuZG9pLmdvdg&tok MTcjY2RyMDZAaW9zLmRvaS5nb3ZmY2RkNTU3MTUxZmFkNWQ1YWVINDVjNTBmN2Y2NDk4ODU4MTg3ZTFj&ctz America/New\_York&hl en.

From: To: Cc: Subject: Start: End: Location: to 16)

whicen deviloeins dol gov: downey maga lanes@los dol gov
golla ojeda-dodds@los dol.gov: christine bauserman@los dol gov: aaron thiele@los dol.gov
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View your event at https://www.google.com/calendar/event?
action VIEW&eid OTI2MGFqdWw2M29xNmZuamJiNGNidG9ZZG8gZ2lzZWxxYV9vamVkYS1kb2Rkx0Bpb3MuZG9pLmdvdg&tok MTcjY2RyMDZAaW9zLmRvaS5nb3ZmY2RkNTU3MTUxZmFkNWQ1YWVINDVjNTBmN2Y2NDk4ODU4MTg3ZTFj&ctz America/New\_York&hl en.





Erik Milito
Group Director
Upstream & Industry Operations
API

1220 L Street, NW

 Washington, DC 20005-4070

 Telephone
 202-682-8273

 Fax
 202-682-8426

 Email
 militoe@api.org

www.api.org

May17, 2017

Honorable Ryan Zinke Secretary of the U.S. Department of the Interior U.S. Department of the Interior 1849 C Street NW Washington, DC 20240

SUBJECT: Secretarial Order 3350

The Honorable Secretary Ryan Zinke,

API is pleased to see the Administration and the Department of the Interior (DOI) continuing to take strides to put in place a lasting, domestically-focused energy policy that will help the U.S. "maintain the Nation's position as a global energy leader." For too long the U.S. has been hampered by the lack of a strong domestic oil and natural gas energy policy. The oil and natural gas industry is committed to developing and producing domestic energy resources for the benefit of all Americans and doing so in a safe and environmentally sound manner. API represents over 625 oil and natural gas companies that supply most of America's energy, support more than 9.8 million jobs and 8 percent of the U.S. economy, and, since 2000, have invested nearly \$2 trillion in U.S. capital projects to advance all forms of energy, including alternatives.

Secretarial Order 3350, America-First Offshore Energy Strategy, which implements Executive Order 13795, is an important step forward that will help the offshore oil and natural gas industry regain the cost-effective regulatory framework that promotes the certainty and predictability necessary to make the massive capital investments required to bring offshore energy projects to the U.S. economy. This will serve to further the Department's stated goal "to ensure that responsible OCS exploration and development is promoted and not unnecessarily delayed or inhibited." This letter is intended to inform the regulatory and policy reviews directed by the order and to offer any needed assistance to you as DOI continues to implement Secretarial Order 3350. In this letter we will address broad themes associated with each subject area addressed in the Secretarial Order and provide specific industry concerns in each area.

API believes there are opportunities to improve many of the DOI rules and policy initiatives while still promoting safety and environmental performance in offshore oil and gas exploration and development. We look forward to further opportunities to work with the Interior Department leadership and staff on these and other rules.

The Secretarial Order highlights many of the rules and policies that API and our industry partners have addressed in extensive comments. Where appropriate we have attached the relevant comments that will help provide specific details of needed changes as DOI performs its reviews of the various regulations, proposed rules, and policy initiatives.

Specific regulatory effort identified in Secretarial Order 3350:

- 1. Development of a new Five-year OCS Leasing Program. For many years, API has advocated for opening additional OCS areas to oil and natural gas exploration. We believe that it is important that DOI's evaluation of OCS areas is all-inclusive (26 Planning Areas) and that this evaluation does not prematurely eliminate areas that have resource development potential. The multi-step program development process is designed to collect information from all stakeholders, to provide the opportunity for careful analysis and consideration of available information, and to allow the Secretary of the Interior to decide on what areas are best suited for future offshore exploration and development activities. Since the existing process does not allow an area that is removed from consideration at an early stage to be added back in at a later stage, it is important not to prematurely eliminate areas from consideration. One important consideration for DOI to keep in mind is that even though a lease sale is scheduled to be held as part of a Fiveyear Program, a decision on whether or not to have the sale is not made until the time the sale is scheduled. This allows DOI flexibility to include lease sales in areas that may be under a temporary moratorium (like the Eastern Gulf of Mexico) or where new data is being collected (like the Atlantic) and then make the ultimate decision to hold the sale or not at the time the sale is scheduled. The decisions made now will have long-lasting impacts on U.S. energy policy. API, our members and our industry partners will be involved at all stages of the Five-year Program development. As a trade association, we are not in a position to provide information on specific areas of interest to our members. Rather we can offer that the prospect of lease sales in any given area will spur industry exploration activity which will provide valuable information to the government on the oil and natural gas potential of an area.
- 2. Cooperate with National Marine Fisheries Service (NMFS) to expedite consideration of Incidental Take Authorization (ITA) requests, including Incidental Harassment Authorizations (IHA) and Letters of Authorization; and, develop and implement a streamlined permitting approach for seismic surveys. This action is long overdue. For over a decade, API and our industry partners have attempted to have DOI and NMFS work together to promulgate incidental take regulations for geological and geophysical (G&G) surveys in the Gulf of Mexico (GOM). Much to our frustration this process has been exceedingly slow in spite of countless industry efforts that have included staff-level and management-level engagements, letters, responses to comment requests, etc. With a looming September 25, 2017 deadline on the expiration of a stay in a lawsuit filed over industry G&G activities in the GOM, this has now reached a near-crisis level. In short, by September 25, 2017 DOI must finish the Programmatic Environmental Impact Statement (PEIS), NMFS must be compelled to propose and finalize incidental take regulations, and NMFS must complete the required consultation with DOI under the Endangered Species Act.

Completing the actions outlined above is complicated by previous agency work. In general, a fundamental flaw with the Draft PEIS was its establishment of an unrealistic scenario in which G&G activities are projected to result in supposed effects to marine mammals that DOI admits are unrealistic overestimates of impact. The supposed adverse effects of this worst case hypothetical scenario were then addressed in the Draft PEIS with burdensome and unsupported mitigation measures. This approach is contrary to both the best available scientific information and applicable law. For over 40 years, the federal government and academic scientists have studied the potential impacts of G&G activities on marine mammals, and have concluded that any such potential impacts are insignificant. The DPEIS's suggestion that such impacts are "moderate" (as opposed to insignificant) is not supported by the best available science and is made possible only by application of overly conservative estimates that DOI admits do not accurately reflect the actual anticipated impacts.

Many of the mitigation measures recommended in certain alternatives presented in the DPEIS are economically and operationally infeasible, will impose serious burdens on industry, and are highly unlikely to result in benefits to protected species. Industry can and will support mitigation measures that are grounded in the best available science and consistent with existing practices that are proven to be effective and operationally feasible. However, we cannot support mitigation measures with no basis in fact or science, which are intended to address presumed adverse effects that will not occur, and which will result in less offshore exploration. As to the alternatives presented in the DPEIS, API finds <u>Alternative A</u> to be the most reasonable because it presents the option that is most consistent with the best available science, operational feasibility, and applicable law.

Unless the faulty assumptions made in the Draft PEIS are corrected, NMFS will be forced to rely on that information to draft the proposed incidental take regulations, which in turn, will likely seek to impose unrealistic and unnecessary mitigation measures on industry. This is contrary to the stated goals of the EO and SO. Detailed industry comments on the DPEIS are attached for your reference.

- 3. Expedite consideration of Atlantic seismic survey permits. The decision to reverse the previous administration's unjust denial of these permits is welcome news. Subsequent action by the Interior Bureau of Land Appeals to remand the appeals of the denied permits back to the Bureau of Ocean Energy Management for further consideration paves the way for approval of those permits. However, NMFS must be compelled to complete its work on ITA permit applications for true progress to be made in this area.
- 4. Complete the review of Financial Assurance guidance found in NTL 2016-NO1. DOI has been working closely with the Offshore Operators Committee (OOC) and the OCS Advisory Board of the Petroleum Landman's Association to remedy the shortcomings of DOI's approach on the issues of risk management and financial assurance. API supports this approach and will be evaluating the suggested changes to the NTL that the industry work group is contemplating.
- 5. <u>Cease activity to promulgate Offshore Air Quality Regulations</u>. API and OOC have been actively engaged with DOI following the issuance of the proposed air quality rule. Based

on industry's extensive comments on the prosed rule (attached) and our engagement over the last year, we believe that DOI had begun to understand the importance of collaborating with industry to gather needed information on our operations in order to promulgate feasible and effective regulations. Industry remains concerned with DOI's ongoing GOM air quality study, particularly with the assumptions made in air quality modelling. Based on our current understanding, we believe the modelling should better reflect actual conditions rather than attempting to depict a worst case scenario. Our efforts to evaluate the work have been hampered by a lack of information. While some information has been made available, still more is required to make a full evaluation. Our recent comments on the Draft GOM Multi-sale Supplement Environmental Impact Statement (attached) detail our current concerns in this area.

Going forward, industry urges DOI to follow an approach similar to that employed in working through the issues associated with the financial assurance NTL (as detailed above). Specifically, we believe the following course of action could be appropriate:

- Create an industry workgroup to provide input on changes to the assumptions and inputs to the modeling study.
- DOI should discontinue the use of its preliminary air quality modeling study results, including their use in NEPA documents.
- DOI should finish its air quality study and use it as input to a revised rulemaking.
- If appropriate based on study results, DOI should restart the rulemaking process with an advance notice of proposed rulemaking (ANPR).
- 6. Review Offshore Well Control Regulations. The Final Well Control Rule is greatly improved from the proposed rule, but numerous concerns still remain. Seven industry trade associations have been working to outline our concerns with the regulation and its implementation and will be sending a separate letter to DOI that will provide specific details. As a preview, we wish to highlight four major concerns, in no particular order: Industry remains concerned with the drilling margin requirements in the final well control rule and suggest deleting the new regulatory text and reverting to the previous requirements. That risk-based approach to managing drilling margin in combination with existing regulatory oversight has been demonstrated to safely and economically drill wells; the requirements that exceed the provisions of API Standard 53 (API 53), Blowout Prevention Equipment Systems for Drilling Wells are unnecessary, will not improve safety and will increase risks to operations, which is why, we recommend using the requirements in API 53 as the primary best practice; rulemaking on Real-Time Monitoring is premature, we suggest deleting those requirements; and, we do not see the need for BSEE to require certification by BSEE-approved verification organizations (BAVOs). Certification can be done by third party organizations; they do not need to be approved by BSEE.
- 7. Review Arctic Drilling and Operations Regulations. API and our industry partners continue to believe that access to Alaska offshore oil and natural gas resources under balanced and science-based regulations is essential to the nation's long term economic and energy security. We encourage DOI to embrace the finding in the 2015 National Petroleum Council "Arctic Potential" report. Specifically, that nearly a century of oil and natural gas exploration and production activity in the region demonstrates that development of the Alaska OCS can take place in a safe and environmentally responsible

manner while protecting habitat, wildlife, communities, and subsistence lifestyles. The 2016 Arctic rules package imposes prescriptive requirements based on the premise that a catastrophic spill is inevitable and that one particular combination of technologies and methods should be applied to operations in all locations. Industry's specific concerns are detailed in comments submitted to the agencies during the rulemaking process (attached), and we are prepared to discuss these concerns with the DOI as part of the review directed under the SO.

We appreciate the actions of this Administration to eliminate unnecessary burden and to restore certainty and predictability into the offshore permitting and regulatory regimes. We look forward to continued engagement with the Department and you on these important issues to assure that the energy that is fundamental to our society can be developed and delivered safely.

Thank you again for your consideration of these comments.

Sincerely,

**Group Director** 

Upstream and Industry Operations

Sille

American Petroleum Institute

CC:

Counselor to the Secretary for Energy Policy Vincent DiVito Acting Assistant Secretary Katharine MacGregor BSEE Director BOEM Director



# American Petroleum Institute Meeting

Created by: caroline\_boulton@ios.doi.gov

Time

2:30pm - 3pm (Eastern Time)

Date

Mon May 22, 2017

Where

Office of the Secretary

Description

Attendees:

Jack Gerard, President & CEO

Topic:

BLM Venting & Flaring rule

Regulatory review

My Notes

#### Guests

- ▲ ✓ downey\_magallanes@ios.doi.gov
- ▲ vincent\_devito@ios.doi.gov
- - christine\_bauserman@ios.doi.gov
- gisella\_ojeda-dodds@ios.doi.gov

# Label: "FOIA Gisella/OS-2017-01201 - API"

## Created by:gisella\_ojeda-dodds@ios.doi.gov

Total Messages in label:26 (7 conversations)

Created: 02-01-2018 at 13:24 PM

### **Conversation Contents**

Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

### **Attachments:**

- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/1.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/2.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/3.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/4.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/5.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/6.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/7.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/8.1 image001.jpg
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- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/14.1 image001.jpg
- /1. Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control/15.1 image001.jpg

## "Devito, Vincent" <vincent\_devito@ios.doi.gov>

From: "Devito, Vincent" < vincent\_devito@ios.doi.gov>
Sent: Wed May 17 2017 13:12:07 GMT-0600 (MDT)

To: Holly Hopkins <hopkinsh@api.org>, "Ojeda-dodds, Gisella"

<gisella ojeda-dodds@ios.doi.gov>

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

**Attachments:** image001.jpg

Okay. Adding Gisella to coordinate. Thanks.

On Wed, May 17, 2017 at 3:08 PM, Holly Hopkins < hopkinsh@api.org > wrote:

Vince.

API would like to come introduce ourselves to you and discuss issues that our members are interested in. We are working on possible dates/times for next week and will get back to you ASAP.

Thanks, Holly

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message ------

From: "Devito, Vincent" < vincent devito@ios.doi.gov >

Date: 5/17/17 2:55 PM (GMT-05:00)
To: Holly Hopkins < hopkinsh@api.org >

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Thank you.

On Wed, May 17, 2017 at 2:42 PM, Holly Hopkins < hopkinsh@api.org > wrote:

In addition to the letter sent this morning by the Joint Trades on the WCR. API sent the attached letter to Secretary Zinke today to cover all the items in the Secretarial Order. I thought you might be interested. Please let us know if you have any questions or would like to discuss further. Thanks.

From: Holly Hopkins

Sent: Wednesday, May 17, 2017 10:21 AM

To: Macgregor, Katharine

Cc: 'Devito, Vincent'; Tom Lillie (<u>Thomas.Lillie@bsee.gov</u>); Doug Morris (<u>douglas.morris@bsee.gov</u>); Lars

Herbst (<u>lars.herbst@bsee.gov</u>); Malstrom, Kirk; Jim Cason; Daniel Jorjani

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Some of you may have already noticed, Vincent's email address was incorrect below. My apologies and corrected above. Thank you again

From: Holly Hopkins

Sent: Wednesday, May 17, 2017 7:51 AM

To: Macgregor, Katharine

**Cc:** Vincent DeVito (<u>vincent\_devito@ios.dio.gov</u>); Tom Lillie (<u>Thomas.Lillie@bsee.gov</u>); Doug Morris (<u>douglas.morris@bsee.gov</u>); Lars Herbst (<u>lars.herbst@bsee.gov</u>); Malstrom, Kirk; Jim Cason; Daniel Jorjani **Subject:** Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Kate.

API, IADC, IPAA, NOIA, OOC, PESA, and the US Oil and Gas Association are pleased to provide detailed information on the final Blowout Preventer Systems and Well Control rule to inform the regulatory and policy review directed by Secretarial Order 3350 and to offer any needed assistance to you as DOI continues to implement the Order.

The Final Well Control Rule is greatly improved from the proposed rule, but numerous concerns still remain. Industry has outlined our concerns in detail in the attached table but wish to highlight four major concerns, in no particular order. Industry remains concerned with the drilling margin requirements in the final well control rule and suggests deleting the new regulatory text and reverting to the previous requirements. That risk-based approach to managing drilling margin in combination with existing regulatory oversight has been demonstrated to safely and economically drill wells. The requirements that exceed the provisions of API Standard 53 (API 53), Blowout Prevention Equipment Systems for Drilling Wells are unnecessary, will not improve safety and will increase risks to operations, which is why, we recommend using the requirements in API 53 as the primary best practice. Rulemaking on RTM is premature, we suggest deleting those requirements.

And finally, Industry does not see the need for BSEE to require certification by BSEE-approved verification organizations (BAVOs). Certification can be done by third party organizations; they do not need to be approved by BSEE.

Safety is a core value for the oil and natural gas industry. We are committed to safe operations and support effective regulations in the area of blowout preventer systems and well control. We appreciate the actions of this Administration to eliminate unnecessary burden and to restore certainty and predictability into the offshore permitting and regulatory regimes. We look forward to continued engagement with the Department and you on these important regulatory requirements to assure that the energy that is fundamental to our society can be developed and delivered safely.

Thank you for your consideration of these comments, please do not hesitate to contact us if you have any questions or would like to meet for further discussion.

Thanks,

Holly A. Hopkins Sr. Policy Advisor, Upstream American Petroleum Institute 1220 L Street, NW Washington, DC 20005 202-682-8439 Tel hopkinsh@api.org cid:image00

This transmission contains information that is privileged and confidential and is intended solely for use of the individual(s) listed above. If you received the communication in error, please notify me immediately. Any dissemination or copying of this communication by anyone other than the individual(s) listed above is prohibited.

## Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent:** Wed May 17 2017 21:25:04 GMT-0600 (MDT)

To: "Devito, Vincent" <vincent\_devito@ios.doi.gov>, "Ojeda-dodds,

Gisella" < gisella\_ojeda-dodds@ios.doi.gov>

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

Thanks.

Gisella, API would like to meet with Vince on Thursday, May 25 at 2:00 pm (or later) if possible.

Thanks again.

From: Devito, Vincent [mailto:vincent\_devito@ios.doi.gov]

**Sent:** Wednesday, May 17, 2017 3:12 PM **To:** Holly Hopkins; Ojeda-dodds, Gisella

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

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Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org
cid:image00

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## "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

From: "Ojeda-dodds, Gisella" <gisella ojeda-dodds@ios.doi.gov>

**Sent:** Thu May 18 2017 09:14:50 GMT-0600 (MDT)

To: Holly Hopkins <hopkinsh@api.org>

**CC:** "Devito, Vincent" < vincent\_devito@ios.doi.gov>

Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

Good Morning,

Thursday, May 25 at 2PM works for Mr. DeVito. I've gone ahead and sent you an invite. If you could please send me the names and titles of those attending with you so that I can let our security office know. Our office is located at:

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If you need anything further please let me know.

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Thanks.

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Thanks again.

From: Devito, Vincent [mailto:vincent devito@ios.doi.gov]

**Sent:** Wednesday, May 17, 2017 3:12 PM **To:** Holly Hopkins; Ojeda-dodds, Gisella

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

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Thank you.

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From: Holly Hopkins

Sent: Wednesday, May 17, 2017 10:21 AM

To: Macgregor, Katharine

Cc: 'Devito, Vincent'; Tom Lillie (<u>Thomas.Lillie@bsee.gov</u>); Doug Morris (<u>douglas.morris@bsee.gov</u>); Lars

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Washington, D.C. 20240

Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

# Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent:** Thu May 18 2017 09:34:13 GMT-0600 (MDT)

To: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

CC: "Devito, Vincent" < vincent devito@ios.doi.gov>

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and

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Attachments: image001.jpg

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Erik Milito, Group Director, Upstream militoe@api.org
Andy Radford, Sr. Policy Advisor, Upstream Radforda@api.org
Richard Ranger, Sr. Policy Advisor, Upstream rangerr@api.org
Carrie Domnitch, Director, Federal Relations domnitchc@api.org
Matt Haynie, Sr. Counsel HaynieM@api.org
Holly A. Hopkins, Sr. Policy Advisor, Upstream

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E-mail: Gisella Ojeda-Dodds@ios.doi.gov

## "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

From: "Ojeda-dodds, Gisella" < gisella\_ojeda-dodds@ios.doi.gov>

**Sent:** Fri May 19 2017 08:40:23 GMT-0600 (MDT)

To: Holly Hopkins <hopkinsh@api.org>

Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

Thanks so much!

Gisella

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Richard Ranger, Sr. Policy Advisor, Upstream <a href="mailto:rangerr@api.org">rangerr@api.org</a>
Carrie Domnitch, Director, Federal Relations <a href="mailto:domnitchc@api.org">domnitchc@api.org</a>
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E-mail: Gisella Ojeda-Dodds@ios.doi.gov

# Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent:** Thu May 25 2017 13:29:57 GMT-0600 (MDT)

**To:** "Ojeda-dodds, Gisella" < gisella\_ojeda-dodds@ios.doi.gov>

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

**Attachments:** image001.jpg

Gisella,

Nice meeting you today. During our discussion today, Vincent suggested we schedule individual meetings with him to go over our specific issues. We ran out of time. I have asked my colleagues to email you directly to schedule their meetings at their convenience.

I'd like to schedule some time with him to discuss issues related to BSEE, I'm available as follows:

2:30 – 3:30 Thursday, June 1 2:00 – 3:00 Friday, June 2 1:00 – 3:00 Wednesday, June 7 1:00 – 3:00 pm Thursday, June 8 9:00 – 3:00 pm Tuesday, June 13 9:00 – 3:00 pm Friday, June 16

If you need more options, please let me know.

Thank you so much, have a nice holiday weekend.

Holly

From: Ojeda-dodds, Gisella [mailto:gisella ojeda-dodds@ios.doi.gov]

Sent: Friday, May 19, 2017 10:40 AM

To: Holly Hopkins

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Holly A. Hopkins Sr. Policy Advisor, Upstream American Petroleum Institute 1220 L Street, NW Washington, DC 20005 202-682-8439 Tel hopkinsh@api.org cid:image0(

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Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

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**Sent:** Fri May 26 2017 15:42:15 GMT-0600 (MDT)

To: Holly Hopkins <hopkinsh@api.org>

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

**Attachments:** image001.jpg

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Thank you so much, have a nice holiday weekend.

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On Wed, May 17, 2017 at 2:42 PM, Holly Hopkins < hopkinsh@api.org > wrote: In addition to the letter sent this morning by the Joint Trades on the WCR. API sent the attached letter to Secretary Zinke today to cover all the items in the Secretarial Order. I thought you might be interested. Please let us know if you have any questions or would like to discuss further. Thanks.

From: Holly Hopkins

Sent: Wednesday, May 17, 2017 10:21 AM

To: Macgregor, Katharine

Cc: 'Devito, Vincent'; Tom Lillie (<u>Thomas.Lillie@bsee.gov</u>); Doug Morris (<u>douglas.morris@bsee.gov</u>); Lars

Herbst (lars.herbst@bsee.gov); Malstrom, Kirk; Jim Cason; Daniel Jorjani

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

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**Subject:** Secretarial Order 3350 & Blowout Preventer Systems and Well Control

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Thank you for your consideration of these comments, please do not hesitate to contact us if you have any questions or would like to meet for further discussion.

Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org
cid:image00

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Megan Bloomgren, Acting Deputy Chief of Staff
Vincent DeVito, Counselor for Energy Policy
&
Downey Magallanes, Special Assistant
Immediate Office of the Secretary
U.S. Department of the Interior

1849 "C" Street, NW, MS: 6136-MIB Washington, D.C. 20240

Telephone: (202) 208-4123/4105

Faraire (202) 200-4123/4103

Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

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E-mail: Gisella Ojeda-Dodds@jos.doj.gov

# Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent:** Wed Jun 07 2017 05:54:59 GMT-0600 (MDT)

**To:** "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

**Attachments:** image001.jpg

Gisella.

My apologies, but I have a conflict with our scheduled meeting on June 13, would it be possible to reschedule for June 22 or 23, or the following week. It would be greatly appreciated.

Thank you, Holly Hopkins

From: Ojeda-dodds, Gisella [mailto:gisella\_ojeda-dodds@ios.doi.gov]

Sent: Friday, May 26, 2017 5:56 PM

To: Holly Hopkins

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

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U.S. Department of the Interior 1849 C Street, NW, 6th Floor, Room 6136 Washington, D.C. 20240 You can enter the building through either the "C" or "E" street entrance. Our office is closest the "C" street entrance. Please bring a valid photo I.D. with you. When you arrive you must check-in with security who will then confirm you as a guest (they will call me at (202) 208-4123 to confirm). They will issue you a blue visitor's badge which you will need to show our guard on the 6th floor. I can escort you from the lobby if you wish. Please be prepared to go through a metal detector.

If you need anything further please let me know.

Sincerely,

Gisella Ojeda-Dodds

On Fri, May 26, 2017 at 5:49 PM, Holly Hopkins < hopkinsh@api.orq > wrote: I will come over. Thanks

Sent from my Verizon. Samsung Galaxy smartphone

----- Original message -----

From: "Ojeda-dodds, Gisella" < gisella ojeda-dodds@jos.doi.gov>

Date: 5/26/17 5:42 PM (GMT-05:00)
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Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Hi Holly,

June 13 at 1PM works well for Mr. DeVito. Will you be coming in person or will this just be by phone? If it is telephonic, I just need the best number for him to reach you at.

Thanks so much!

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I'd like to schedule some time with him to discuss issues related to BSEE, I'm available as follows:

2:30 – 3:30 Thursday, June 1 2:00 – 3:00 Friday, June 2 1:00 – 3:00 Wednesday, June 7 1:00 – 3:00 pm Thursday, June 8 9:00 – 3:00 pm Tuesday, June 13 9:00 – 3:00 pm Friday, June 16

If you need more options, please let me know.

Thank you so much, have a nice holiday weekend.

Holly

From: Ojeda-dodds, Gisella [mailto:gisella\_ojeda-dodds@ios.doi.gov]

**Sent:** Friday, May 19, 2017 10:40 AM

To: Holly Hopkins

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Thanks so much!

#### Gisella

On Thu, May 18, 2017 at 11:34 AM, Holly Hopkins < hopkinsh@api.orq > wrote: Excellent, thank you.

Our list of attendees:

Erik Milito, Group Director, Upstream militoe@api.org
Andy Radford, Sr. Policy Advisor, Upstream Radforda@api.org
Richard Ranger, Sr. Policy Advisor, Upstream rangerr@api.org
Carrie Domnitch, Director, Federal Relations domnitchc@api.org
Matt Haynie, Sr. Counsel HaynieM@api.org
Holly A. Hopkins, Sr. Policy Advisor, Upstream

See you next week. Thank you again.

From: Ojeda-dodds, Gisella [mailto:gisella ojeda-dodds@ios.doi.gov]

Sent: Thursday, May 18, 2017 11:15 AM

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# "Ojeda-dodds, Gisella" < gisella\_ojeda-dodds@ios.doi.gov>

From: "Ojeda-dodds, Gisella" <gisella ojeda-dodds@ios.doi.gov>

**Sent**: Wed Jun 07 2017 08:47:52 GMT-0600 (MDT)

To: Holly Hopkins <hopkinsh@api.org>

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

Good Morning,

No worries. Unfortunately, he is on travel on June 22 and 23 but would be available the next week of June 26 as follows

Monday, June 26

- 11:30AM
- between 1-2PM

Tuesday, June 27 -between 11-12PM

- -Detweell 11-12FN
- between 1-2PM

- 4PM

Wednesday, June 28

- -between 11-12PM
- between 1-2PM
- 4PM

Thursday, June 29

- -between 11-12PM
- between 1-2PM
- 4PM

Just let me know which date and time is best and I'll send out an invite to you.

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Immediate Office of the Secretary U.S. Department of the Interior 1849 "C" Street, NW, MS: 6136-MIB

Washington, D.C. 20240

Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

--

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Vincent DeVito, Counselor to the Secretary for Energy Policy
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E-mail: Gisella Ojeda-Dodds@ios.doi.gov

# Holly Hopkins < hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent**: Wed Jun 07 2017 08:48:57 GMT-0600 (MDT)

To: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

Great I will get back to you thanks

Sent from my Verizon, Samsung Galaxy smartphone

------ Original message ------

From: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

Date: 6/7/17 10:48 AM (GMT-05:00)
To: Holly Hopkins <hopkinsh@api.org>

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Good Morning,

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- 4PM

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Just let me know which date and time is best and I'll send out an invite to you.

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Thank you, Holly Hopkins

From: Ojeda-dodds, Gisella [mailto:gisella\_ojeda-dodds@ios.doi.gov]

Sent: Friday, May 26, 2017 5:56 PM

To: Holly Hopkins

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

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If you need anything further please let me know.

Sincerely,

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From: "Ojeda-dodds, Gisella" < <a href="mailto:qisella ojeda-dodds@ios.doi.gov">qisella ojeda-dodds@ios.doi.gov</a>>

Date: 5/26/17 5:42 PM (GMT-05:00)
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June 13 at 1PM works well for Mr. DeVito. Will you be coming in person or will this just be by phone? If it is telephonic, I just need the best number for him to reach you at.

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9:00 - 3:00 pm Tuesday, June 13

9:00 - 3:00 pm Friday, June 16

If you need more options, please let me know.

Thank you so much, have a nice holiday weekend.

Holly

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Sent: Friday, May 19, 2017 10:40 AM

To: Holly Hopkins

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Thanks so much!

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On Thu, May 18, 2017 at 11:34 AM, Holly Hopkins < hopkinsh@api.org > wrote: Excellent, thank you.

Our list of attendees:

Erik Milito, Group Director, Upstream militoe@api.org
Andy Radford, Sr. Policy Advisor, Upstream Radforda@api.org
Richard Ranger, Sr. Policy Advisor, Upstream rangerr@api.org
Carrie Domnitch, Director, Federal Relations domnitchc@api.org
Matt Haynie, Sr. Counsel HaynieM@api.org
Holly A. Hopkins, Sr. Policy Advisor, Upstream

See you next week. Thank you again.

From: Ojeda-dodds, Gisella [mailto:qisella\_ojeda-dodds@ios.doi.gov]

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Thanks again.

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**Sent:** Wednesday, May 17, 2017 3:12 PM **To:** Holly Hopkins; Ojeda-dodds, Gisella

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From: Holly Hopkins

Sent: Wednesday, May 17, 2017 10:21 AM

To: Macgregor, Katharine

Cc: 'Devito, Vincent'; Tom Lillie (<u>Thomas.Lillie@bsee.gov</u>); Doug Morris (<u>douglas.morris@bsee.gov</u>); Lars

Herbst (<u>lars.herbst@bsee.gov</u>); Malstrom, Kirk; Jim Cason; Daniel Jorjani

Subject: RE: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Some of you may have already noticed, Vincent's email address was incorrect below. My apologies and corrected above. Thank you again

From: Holly Hopkins

Sent: Wednesday, May 17, 2017 7:51 AM

To: Macgregor, Katharine

Cc: Vincent DeVito (<u>vincent\_devito@ios.dio.gov</u>); Tom Lillie (<u>Thomas.Lillie@bsee.gov</u>); Doug Morris (<u>douglas.morris@bsee.gov</u>); Lars Herbst (<u>lars.herbst@bsee.gov</u>); Malstrom, Kirk; Jim Cason; Daniel Jorjani

Subject: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

Kate,

API, IADC, IPAA, NOIA, OOC, PESA, and the US Oil and Gas Association are pleased to provide detailed information on the final Blowout Preventer Systems and Well Control rule to inform the regulatory and policy review directed by Secretarial Order 3350 and to offer any needed assistance to you as DOI continues to implement the Order.

The Final Well Control Rule is greatly improved from the proposed rule, but numerous concerns still remain. Industry has outlined our concerns in detail in the attached table but wish to highlight four major concerns, in no particular order. Industry remains concerned with the drilling margin requirements in the final well control rule and suggests deleting the new regulatory text and reverting to the previous requirements. That risk-based approach to managing drilling margin in combination with existing regulatory oversight has been demonstrated to safely and economically drill wells. The requirements that exceed the provisions of API Standard 53 (API 53), Blowout Prevention Equipment Systems for Drilling Wells are unnecessary, will not improve safety and will increase risks to operations, which is why, we recommend using the requirements in API 53 as the primary best practice. Rulemaking on RTM is premature, we suggest deleting those requirements. And finally, Industry does not see the need for BSEE to require certification by BSEE-approved verification organizations (BAVOs). Certification can be done by third party organizations; they do not need to be approved by BSEE.

Safety is a core value for the oil and natural gas industry. We are committed to safe operations and support effective regulations in the area of blowout preventer systems and well control. We appreciate the actions of this Administration to eliminate unnecessary burden and to restore certainty and predictability into the offshore permitting and regulatory regimes. We look forward to continued engagement with the Department and you on these important regulatory requirements to assure that the energy that is fundamental to our society can be developed and delivered safely.

Thank you for your consideration of these comments, please do not hesitate to contact us if you have any questions or would like to meet for further discussion.

Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org
cid:image00

This transmission contains information that is privileged and confidential and is intended solely for use of the individual(s) listed above. If you received the communication in error, please notify me immediately. Any dissemination or copying of this communication by anyone other than the individual(s) listed above is prohibited.

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Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

We can do:

Monday, June 26

- 11:30AM

Tuesday, June 27 -between 11-12PM - between 1-2PM

When you send the calendar invite, can you please add my colleagues Matt Haynie hayniem@api.org and Carrie Domnitch domnitchc@api.org.

Thanks, Holly ----- Original message -----

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Richard Ranger, Sr. Policy Advisor, Upstream rangerr@api.org
Carrie Domnitch, Director, Federal Relations domnitchc@api.org
Matt Haynie, Sr. Counsel HaynieM@api.org
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U.S. Department of the Interior
1849 "C" Street, NW, MS: 6136-MIB

Washington, D.C. 20240 Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

# "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

From: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

**Sent:** Wed Jun 07 2017 12:41:13 GMT-0600 (MDT)

To: Holly Hopkins <hopkinsh@api.org>

Subject: Re: Secretarial Order 3350 & Blowout Preventer Systems and

Well Control

Attachments: image001.jpg

Hi Holly,

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- 11:30AM

Tuesday, June 27 -between 11-12PM

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Thanks, Holly

Sent from my Verizon, Samsung Galaxy smartphone

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Richard Ranger, Sr. Policy Advisor, Upstream rangerr@api.org
Carrie Domnitch, Director, Federal Relations domnitchc@api.org
Matt Haynie, Sr. Counsel HaynieM@api.org
Holly A. Hopkins, Sr. Policy Advisor, Upstream

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Cc: 'Devito, Vincent'; Tom Lillie (Thomas.Lillie@bsee.gov); Doug Morris (douglas.morris@bsee.gov); Lars

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Kate.

API, IADC, IPAA, NOIA, OOC, PESA, and the US Oil and Gas Association are pleased to provide detailed information on the final Blowout Preventer Systems and Well Control rule to inform the regulatory and policy review directed by Secretarial Order 3350 and to offer any needed assistance to you as DOI continues to implement the Order.

The Final Well Control Rule is greatly improved from the proposed rule, but numerous concerns still remain. Industry has outlined our concerns in detail in the attached table but wish to highlight four major concerns, in no particular order. Industry remains concerned with the drilling margin requirements in the final well control rule and suggests deleting the new regulatory text and reverting to the previous requirements. That risk-based approach to managing drilling margin in combination with existing regulatory oversight has been demonstrated to safely and economically drill wells. The requirements that exceed the provisions of API Standard 53 (API 53), Blowout Prevention Equipment Systems for Drilling Wells are unnecessary, will not improve safety and will increase risks to operations, which is why, we recommend using the requirements in API 53 as the primary best practice. Rulemaking on RTM is premature, we suggest deleting those requirements. And finally, Industry does not see the need for BSEE to require certification by BSEE-approved verification organizations (BAVOs). Certification can be done by third party organizations; they do not need to be approved by BSEE.

Safety is a core value for the oil and natural gas industry. We are committed to safe operations and support effective regulations in the area of blowout preventer systems and well control. We appreciate the actions of this Administration to eliminate unnecessary burden and to restore certainty and predictability into the offshore permitting and regulatory regimes. We look forward to continued engagement with the Department and you on these important regulatory requirements to assure that the energy that is fundamental to our society can be developed and delivered safely.

Thank you for your consideration of these comments, please do not hesitate to contact us if you have any questions or would like to meet for further discussion.

Thanks,

Holly A. Hopkins
Sr. Policy Advisor, Upstream
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
202-682-8439 Tel
hopkinsh@api.org
cid:image00

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Vincent DeVito, Counselor for Energy Policy
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Holly A. Hopkins Sr. Policy Advisor, Upstream American Petroleum Institute 1220 L Street, NW Washington, DC 20005 202-682-8439 Tel hopkinsh@api.org cid:image0(

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Vincent DeVito, Counselor to the Secretary for Energy Policy

Immediate Office of the Secretary U.S. Department of the Interior 1849 "C" Street, NW, MS: 6136-MIB Washington, D.C. 20240

Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

--

Gisella Ojeda-Dodds

Executive Assistant to Douglas Domenech, Senior Advisor

Downey Magallanes, Acting Deputy Chief of Staff Vincent DeVito, Counselor to the Secretary for Energy Policy

Immediate Office of the Secretary U.S. Department of the Interior 1849 "C" Street, NW, MS: 6136-MIB Washington, D.C. 20240 Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

#### **Conversation Contents**

Requesting a Meeting with Mr. deVito for Friday, June 9

#### Richard Ranger < rangerr@api.org>

From: Richard Ranger <rangerr@api.org>

**Sent:** Fri May 26 2017 13:07:56 GMT-0600 (MDT)

To: "gisella\_ojeda-dodds@ios.doi.gov" <gisella\_ojeda-

dodds@ios.doi.gov>

**Subject:** Requesting a Meeting with Mr. deVito for Friday, June 9

Good afternoon, Gisella -

With this email, I'm writing to request the opportunity for three of us from API – Carrie Domnitch, Matt Haynie, and myself – to meet with Senior Counselor DeVito in the afternoon of Friday, June 9 (preferably earlier rather than later that afternoon). This meeting request responds to his invitation at the API meeting yesterday that we each attended, and its focus would be on BLM regulatory matters, in particular the BLM Methane Rule, and the three rules – Site Security, Measurement of Oil, and Measurement of Gas – that replaced the agency's Onshore Orders 3, 4, and 5.

Thank you very much for your assistance with this request.

Very truly yours,

# Richard Ranger

API 1220 L Street NW Washington DC 20005 202.682.8057

# "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

From: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

**Sent:** Fri May 26 2017 15:58:08 GMT-0600 (MDT)

To: Richard Ranger <rangerr@api.org>

Subject: Re: Requesting a Meeting with Mr. deVito for Friday, June 9

Good Evening,

Unfortunately, Mr. DeVito is not available Friday afternoon on June 9 but could be available on Thursday, June 8 at 5PM. I can also check other times earlier in the week if you prefer or the week after.

Sincerely,

Gisella Ojeda-Dodds

On Fri, May 26, 2017 at 3:07 PM, Richard Ranger < rangerr@api.org > wrote:

Good afternoon, Gisella -

With this email, I'm writing to request the opportunity for three of us from API – Carrie Domnitch, Matt Haynie, and myself – to meet with Senior Counselor DeVito in the afternoon of Friday, June 9 (preferably earlier rather than later that afternoon). This meeting request responds to his invitation at the API meeting yesterday that we each attended, and its focus would be on BLM regulatory matters, in particular the BLM Methane Rule, and the three rules – Site Security, Measurement of Oil, and Measurement of Gas – that replaced the agency's Onshore Orders 3, 4, and 5.

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Very truly yours,

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API 1220 L Street NW Washington DC 20005 202.682.8057

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Gisella Ojeda-Dodds
Executive Assistant to Douglas Domenech, Senior Advisor Megan Bloomgren, Acting Deputy Chief of Staff Vincent DeVito, Counselor for Energy Policy & Downey Magallanes, Special Assistant Immediate Office of the Secretary U.S. Department of the Interior 1849 "C" Street, NW, MS: 6136-MIB Washington, D.C. 20240

Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

# Richard Ranger < rangerr@api.org>

From: Richard Ranger <rangerr@api.org>

**Sent**: Tue May 30 2017 09:57:11 GMT-0600 (MDT)

To: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>
Subject: RE: Requesting a Meeting with Mr. deVito for Friday, June 9

Good morning Gisella -

Would Wednesday morning, June 7 (early) work for Mr. DeVito. By 'early', I would mean a meeting ending by 9:45 that morning. Another possibility that same day is a meeting scheduled sometime between 11:30 and 2:00.

I am waiting to see whether the two colleagues who would be joining me at this meeting could meet at 5:00 on Thursday the 8<sup>th</sup>, and will get back to you as soon as I have that information.

Thank you!

# Richard Ranger

API 1220 L Street NW Washington DC 20005 202.682.8057

From: Ojeda-dodds, Gisella [mailto:gisella\_ojeda-dodds@ios.doi.gov]

**Sent:** Friday, May 26, 2017 5:58 PM

To: Richard Ranger

Subject: Re: Requesting a Meeting with Mr. deVito for Friday, June 9

Good Evening,

Unfortunately, Mr. DeVito is not available Friday afternoon on June 9 but could be available on Thursday, June 8 at 5PM. I can also check other times earlier in the week if you prefer or the week after.

Sincerely,

Gisella Ojeda-Dodds

On Fri, May 26, 2017 at 3:07 PM, Richard Ranger < rangerr@api.org > wrote: Good afternoon, Gisella –

With this email, I'm writing to request the opportunity for three of us from API – Carrie Domnitch, Matt Haynie, and myself – to meet with Senior Counselor DeVito in the afternoon of Friday, June 9 (preferably earlier rather than later that afternoon). This meeting request responds to his invitation at the API meeting yesterday that we each attended, and its focus would be on BLM regulatory matters, in particular the BLM Methane Rule, and the three rules – Site Security, Measurement of Oil, and Measurement of Gas – that replaced the agency's Onshore Orders 3, 4, and 5.

Thank you very much for your assistance with this request.

Very truly yours,

# Richard Ranger

API 1220 L Street NW Washington DC 20005 202.682.8057

Gisella Ojeda-Dodds
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Megan Bloomgren, Acting Deputy Chief of Staff
Vincent DeVito, Counselor for Energy Policy
&
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Washington, D.C. 20240
Telephone: (202) 208-4123/4105

Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

#### **Conversation Contents**

Automatic reply: Secretarial Order 3350 & Blowout Preventer Systems and Well Control

#### Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent:** Thu May 18 2017 09:15:08 GMT-0600 (MDT)

To: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>
Automatic reply: Secretarial Order 3350 & Blowout Preventer

Subject: Systems and Well Control

I am currently out of the office on business travel until Friday, May 19, 2017. I will respond to your message as soon as possible. Thanks. Have a great day!

#### Holly Hopkins <hopkinsh@api.org>

From: Holly Hopkins <hopkinsh@api.org>

**Sent:** Fri May 26 2017 15:42:34 GMT-0600 (MDT)

To: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>
Automatic reply: Secretarial Order 3350 & Blowout Preventer

Subject: Systems and Well Control

I am currently out of the office as follows until Thursday, June 1, 2017. I will respond to your message as soon as possible. Thanks. Have a great holiday weekend!

Friday, May 26 Vacation Monday, May 29 API Closed for Memorial Day Holiday Tuesday & Wednesday, May 30 & 31 Business Travel

### **Conversation Contents**

Fwd: INFORMATION MEMO FOR THE SECRETARY.docx - Invitation to edit

#### Vincent Devito <vincent\_devito@ios.doi.gov>

From: Vincent Devito <vincent\_devito@ios.doi.gov>
Sent: Fri May 19 2017 12:56:04 GMT-0600 (MDT)

To: gisella\_ojeda-dodds@ios.doi.gov

Subject: Fwd: INFORMATION MEMO FOR THE SECRETARY.docx -

Invitation to edit

Please also send this one in Word. Thanks.

Begin forwarded message:

From: "Aaron Thiele (via Google Docs)" < <a href="mailto:drive-shares-noreply@google.com">drive-shares-noreply@google.com</a>

Date: May 19, 2017 at 1:47:53 PM EDT To: <vincent devito@ios.doi.gov>

Cc: < dailybriefingbinder@ios.doi.gov >

Subject: INFORMATION MEMO FOR THE SECRETARY.docx - Invitation to edit

Reply-To: Aaron Thiele < aaron thiele@ios.doi.gov >

Aaron Thiele has invited you to edit the following document:

#### INFORMATION MEMO FOR THE SECRETARY.docx



Hey Vincent,

Sorry to drop this on you last minute, but a meeting with API just got added to the Secretary's schedule for Monday at 2:30pm.

Can you please complete the attached meeting memo and send it back by COB today so I can ensure it gets in the Secretary's briefing binder.

Thanks, Aaron

Open in Docs

Google Docs: Create and edit documents online.

Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA You have received this email because someone shared a document with you from Google Docs.



# "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

From: "Ojeda-dodds, Gisella" <gisella ojeda-dodds@ios.doi.gov>

Sent: Fri May 19 2017 13:58:39 GMT-0600 (MDT) To: Vincent Devito <vincent devito@ios.doi.gov>

Re: INFORMATION MEMO FOR THE SECRETARY.docx -Subject:

Invitation to edit

Sorry - I've requested permission but they haven't granted yet. :0( Gisella

On Fri, May 19, 2017 at 2:56 PM, Vincent Devito < vincent devito@ios.doi.gov > wrote: Please also send this one in Word. Thanks.

Begin forwarded message:

From: "Aaron Thiele (via Google Docs)" < <a href="mailto:drive-shares-noreply@google.com">drive-shares-noreply@google.com</a>

**Date:** May 19, 2017 at 1:47:53 PM EDT

To: < vincent devito@ios.doi.gov> Cc: <dailybriefingbinder@ios.doi.gov>

Subject: INFORMATION MEMO FOR THE SECRETARY.docx - Invitation to

edit

Aaron Thiele has invited you to edit the following document:



# INFORMATION MEMO FOR THE SECRETARY.docx



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Open in Docs

Google Docs: Create and edit documents online.

Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because someone shared a document with you from Google Docs.



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Gisella Ojeda-Dodds
Executive Assistant to Douglas Domenech, Senior Advisor Megan Bloomgren, Acting Deputy Chief of Staff Vincent DeVito, Counselor for Energy Policy & Downey Magallanes, Special Assistant Immediate Office of the Secretary U.S. Department of the Interior 1849 "C" Street, NW, MS: 6136-MIB Washington, D.C. 20240

Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

From: Vincent Devito <vincent\_devito@ios.doi.gov>
Sent: Fri May 19 2017 14:00:56 GMT-0600 (MDT)

To: "Ojeda-dodds, Gisella" <gisella\_ojeda-dodds@ios.doi.gov>

Re: INFORMATION MEMO FOR THE SECRETARY.docx -

Subject: Invitation to edit

That is okay. They are on it. Thanks.

On May 19, 2017, at 3:58 PM, Ojeda-dodds, Gisella < gisella ojeda-dodds@ios.doi.gov > wrote:

Sorry - I've requested permission but they haven't granted yet. :0( Gisella

On Fri, May 19, 2017 at 2:56 PM, Vincent Devito < <u>vincent devito@ios.doi.gov</u>> wrote:

Please also send this one in Word. Thanks.

Begin forwarded message:

From: "Aaron Thiele (via Google Docs)" < drive-shares-

noreply@google.com>

Date: May 19, 2017 at 1:47:53 PM EDT

To: < vincent devito@ios.doi.gov > Cc: < dailybriefingbinder@ios.doi.gov >

Subject: INFORMATION MEMO FOR THE SECRETARY.docx -

Invitation to edit

Reply-To: Aaron Thiele < aaron thiele@ios.doi.gov >

Aaron Thiele has invited you to edit the following document:



# INFORMATION MEMO FOR THE SECRETARY.docx



Hey Vincent,

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94043, USA

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\_\_

Gisella Ojeda-Dodds
Executive Assistant to Douglas Domenech, Senior Advisor
Megan Bloomgren, Acting Deputy Chief of Staff
Vincent DeVito, Counselor for Energy Policy &
Downey Magallanes, Special Assistant
Immediate Office of the Secretary
U.S. Department of the Interior
1849 "C" Street, NW, MS: 6136-MIB

Washington, D.C. 20240 Telephone: (202) 208-4123/4105 Facsimile: (202) 208-4561

E-mail: Gisella Ojeda-Dodds@ios.doi.gov

#### **Conversation Contents**

Invitation: American Petroleum Institute Meeting @ Mon May 22, 2017 2:30pm - 3pm (gisella ojeda-dodds@ios.doi.gov)

#### **Attachments:**

/5. Invitation: American Petroleum Institute Meeting @ Mon May 22, 2017 2:30pm - 3pm (gisella\_ojeda-dodds@ios.doi.gov)/1.1 invite.ics

/5. Invitation: American Petroleum Institute Meeting @ Mon May 22, 2017 2:30pm - 3pm (gisella ojeda-dodds@ios.doi.gov)/1.2 invite.ics

# (b) (6) - Ryan Zinke

From: (b) (6) - Ryan Zinke

**Sent:** Fri May 19 2017 11:18:31 GMT-0600 (MDT)

To: vincent devito@ios.doi.gov, downey magallanes@ios.doi.gov

cc: gisella\_ojeda-dodds@ios.doi.gov,

christine\_bauserman@ios.doi.gov, aaron\_thiele@ios.doi.gov

Invitation: American Petroleum Institute Meeting @ Mon May 22,

2017 2:30pm - 3pm (gisella\_ojeda-dodds@ios.doi.gov)

Attachments: invite.ics invite.ics

#### **American Petroleum Institute Meeting**

more details »

Attendees:

Subject:

Jack Gerard, President & CEO

Topic:

BLM Venting & Flaring rule

Regulatory review

When Mon May 22, 2017 2:30pm – 3pm Eastern Time

Where Office of the Secretary (map)

Video call https://plus.google.com/hangouts/\_/doi.gov/doi-gov-6e9vkmq

Calendar gisella\_ojeda-dodds@ios.doi.gov

Who • (b) (6) - Ryan Zinke organizer

• caroline boulton@ios.doi.gov - creator

• caroline\_boulton@los.doi.gov - clea

vincent\_devito@ios.doi.gov

downey\_magallanes@ios.doi.gov

gisella\_ojeda-dodds@ios.doi.gov - optionalchristine bauserman@ios.doi.gov - optional

• aaron\_thiele@ios.doi.gov - optional

#### Your attendance is optional.

Going? Yes - Maybe - No more options »

Invitation from Google Calendar

You are receiving this email at the account gisella\_ojeda-dodds@ios.doi.gov because you are subscribed for invitations on calendar gisella\_ojeda-dodds@ios.doi.gov.

To stop receiving these emails, please log in to https://www.google.com/calendar/ and change your notification settings for this calendar.

Forwarding this invitation could allow any recipient to modify your RSVP response. Learn More.

#### **Conversation Contents**

Fwd: Final Zinke Offshore Secretarial Order Letter

#### Attachments:

Fwd: Final Zinke Offshore Secretarial Order Letter/1.1 image001.jpg

16. Fwd: Final Zinke Offshore Secretarial Order Letter/1.2 170516 - FINAL - Zinke Letter - Sec Order 3350.pdf

16. Fwd: Final Zinke Offshore Secretarial Order Letter/1.3 161129 - GOM PDEIS - Final Draft Comment Letter - API-IAGC-NOIA-OOC.pdf

16. Fwd: Final Zinke Offshore Secretarial Order Letter/1.4 150522 Final API Ltr BSEE-BOEM Arctic Rules Package.pdf

16. Fwd: Final Zinke Offshore Secretarial Order Letter/1.5 160620 Joint Trades Comments - Air Quality Control Reporting and Compliance - Docket ID BOEM-2013-0081.pdf

#### "Devito, Vincent" <vincent\_devito@ios.doi.gov>

"Devito, Vincent" <vincent devito@ios.doi.gov> From: Wed May 17 2017 12:52:20 GMT-0600 (MDT) Sent:

"Ojeda-dodds, Gisella" < gisella ojeda-dodds@ios.doi.gov> To:

Fwd: Final Zinke Offshore Secretarial Order Letter Subject:

> image001.jpg 170516 - FINAL - Zinke Letter - Sec Order 3350.pdf 161129 - GOM PDEIS - Final Draft Comment Letter - API-IAGC-

NOIA-OOC.pdf 150522 Final API Ltr BSEE-BOEM Arctic Rules Attachments:

> Package.pdf 160620 Joint Trades Comments - Air Quality Control Reporting and Compliance - Docket ID BOEM-2013-0081.pdf

please print.

essage ---

From: Erik Milito <militoe@api.org> Date: Wed, May 17, 2017 at 1:26 PM

Subject: Final Zinke Offshore Secretarial Order Letter

To: "Secretary of Interior (b) (6) - Ryan Zinke

"caroline\_boulton@ios.doi.gov" <caroline\_boulton@ios.doi.gov> Cc: "gareth rees@ios.doi.gov" <gareth rees@ios.doi.gov>,

"katharine macgregor@ios.doi.gov" <katharine macgregor@ios.doi.gov>.

"catherine gulac@ios.doi.gov" <catherine gulac@ios.doi.gov>, "vincent devito@ios.doi.gov" <vincent\_devito@ios.doi.gov>, "timothy\_williams@ios.doi.gov" <timothy\_williams@ios.doi.gov>, Marty Durbin <durbinm@api.org>, Khary Cauthen <cauthenk@api.org>

Secretary Zinke,

API is appreciative of your leadership and the proactive approach that you and the Department have taken to promote domestic energy development. We specifically are encouraged by the steps outlined in Secretarial Order 3350, which advances an America first approach to offshore energy and will help us maintain our position as a global energy leader. We respectfully provide the attached letter (and associated attachments) to inform the regulatory and policy reviews directed by the order and to offer any needed assistance to you as DOI continues to implement the Secretarial Order. In this letter we address broad themes associated with each subject area addressed in the Secretarial Order and provide specific industry concerns in each area.

Again, thank you for your leadership, and we look forward to continued engagement to help drive American energy production forward.

Best regards,

Erik Milito
Group Director, Upstream & Industry Operations
American Petroleum Institute
1220 L Street, NW
Washington, DC 20005
Ph: (202) 682-8273
Fx: (202) 682-8426
militoe@api.org
cid:image001

This transmission contains information that is privileged and confidential and is intended solely for use of the individual(s) listed above. If you received the communication in error, please notify me immediately. Any dissemination or copying of this communication by anyone other than the individual(s) listed above is prohibited.

#### **Conversation Contents**

Fwd: Joint Trade Association Comments - Gulf of Mexico Outer Continental Shelf Lease Sale Draft Supplemental Environmental Impact Statement 2018 - Docket ID: BOEM-2017-0001

#### Attachments:

I7. Fwd: Joint Trade Association Comments - Gulf of Mexico Outer Continental Shelf Lease Sale Draft Supplemental Environmental Impact Statement 2018 - Docket ID: BOEM-2017-0001/1.1 Final Joint Trades Comments - Draft SEIS MMAA10400 - Docket ID BOEM-2017-0001.pdf

#### Vincent Devito <vincent\_devito@ios.doi.gov>

From: Vincent Devito <vincent\_devito@ios.doi.gov>
Sent: Mon May 15 2017 16:32:52 GMT-0600 (MDT)

To: gisella\_ojeda-dodds@ios.doi.gov

Fwd: Joint Trade Association Comments - Gulf of Mexico Outer

Subject: Continental Shelf Lease Sale Draft Supplemental Environmental

Impact Statement 2018 - Docket ID: BOEM-2017-0001

Attachments: Final Joint Trades Comments - Draft SEIS MMAA10400 - Docket

ID BOEM-2017-0001.pdf

Pls print.

Begin forwarded message:

From: Greg Southworth < greg@offshoreoperators.com >

Date: May 15, 2017 at 5:26:29 PM EDT

To: < katharine macgregor@ios.doi.gov >, < vincent devito@ios.doi.gov >,

<walter.cruickshank@boem.gov>, <michael.celata@boem.gov>,

<holli.ensz@boem.gov>, <peter.meffert@boem.gov>, <helen.rucker@boem.gov>

Subject: Joint Trade Association Comments - Gulf of Mexico Outer Continental Shelf Lease Sale Draft Supplemental Environmental Impact Statement 2018 -

Docket ID: BOEM-2017-0001

Reply-To: <a href="mailto:qreq@offshoreoperators.com">qreq@offshoreoperators.com</a>

The attached comments were submitted this afternoon (May 15, 2017) to the above-referenced docket on <a href="https://www.requlations.gov">www.requlations.gov</a>. The attached comments were developed on behalf of the American Petroleum Institute (API), the National Ocean Industries Association (NOIA), the Louisiana Mid-Continent Oil and Gas Association (LMOGA), the Petroleum Equipment and Services Association (PESA), and the Offshore Operators Committee (OOC).

The attached comments are being provided directly to you for your information, review and use.

Thank you.

Sincerely.

Greg Southworth Associate Director Offshore Operators Committee greg@offshoreoperators.com